



Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for 2010 covering the prior calendar year 2009

Date Filed: February 23, 2010

Name of company covered by this certification: Perry-Spencer RTC Inc. (d/b/a PSC) and Perry-Spencer Communications Inc. (d/b/a PSC)

Form 499 Filer ID: 805320 and 818846

Name of Signatory: James M. Dauby

Title of Signatory: President/CEO

I, James M. Dauby, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the companies' procedures ensure that the companies are in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The companies have not taken any actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

A handwritten signature in blue ink, appearing to read 'James M. Dauby', is written over a horizontal line.

Attachment:

Accompanying Statement explaining CPNI procedures

PSC

11877 E. State Road 62 P.O. Box 126 Saint Meinrad, Indiana 47577  
(812) 357-2123 Fax (812) 357-2211  
www.psci.net psc@psci.net



### Statement of Explanation: CPNI Compliance

The operating procedures of Perry-Spencer Rural Telephone Cooperative, Inc. (d/b/a PSC) and of Perry-Spencer Communications (d/b/a PSC) are designed to ensure compliance with the CPNI rules applicable to them (including the new CPNI rules effective December 8, 2007). Such compliance procedures are as follows:

- PSC has designated a CPNI Compliance Officer for the company. PSC maintains CPNI files, including the tracking of all customer complaints for one year, tracking of CPNI breaches for two years, and all Opt-Out customers. The Compliance Officer reviews and approves all marketing and sales campaigns and stores copies in the CPNI file for a minimum period of one year.
- PSC (Compliance Officer) trains and certifies all company employees with access to CPNI regarding CPNI requirements.
- PSC only shares call detail records (CDR's) by mailing the CDR to the customers' address of record (of at least 30 days) or in person after confirming the customer's identity with a valid, government-issued ID. PSC authenticates all customers to discuss any non-CDR details on their accounts.
- PSC uses an Opt-Out approach to target market products and services outside the existing customer relationship. PSC sends opt-out notices to all customers every two years. PSC also sends opt-out notices to all new customers. Opt-out status is clearly shown on the customers' accounts.
- PSC has a process in place to notify customers of account changes (address changes, etc.). PSC mails a generic letter to those customers within 48 hours after a change has been made to their account.
- PSC will notify law enforcement (the FBI and the United States Secret Service) within seven business days after a breach occurs. After the seven days waiting period for law enforcement notification, PSC will notify the customer of any CPNI breach.
- PSC has established disciplinary procedures for employee violations of CPNI rules whether intentional or unintentional.
- PSC will take measures to discover and protect against pretexting and unauthorized disclosures of CPNI. PSC recognizes they have a 'general duty' to protect CPNI and will take measures to protect their customers' CPNI.
- PSC will file an annual certification and statement of CPNI compliance by March 1<sup>st</sup> each year.

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